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*NOT ADMITTED IN VA

September 14, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W., Room TW-B204 Washington, D.C. 20554

> Federal-State Joint Board on Universal Service Re: WC Docket No. 05-337; CC Docket No. 96-45; GN Docket No. 09-51; WC Docket No. 06-122

> > CC Docket No. 01-92

Madam Secretary:

In accordance with Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an ex parte presentation made in connection with the abovecaptioned proceeding.

On Monday, September 12, 2011, Douglas Minster, Vice President Government and Regulatory Affairs, Atlantic Tele-Network, Inc. ("ATNI"), and Rohan Ranaraja, Director, Regulatory Compliance, Allied Wireless Communications Corporation ("Allied Wireless"), had meetings with Amy Bender, Patrick Halley, Rick Kaplan, Zachary Katz, Angela Kronenberg, Carol Mattey, Margaret McCarthy, James Schlichting, and Margaret Wiener, to discuss the Commission's proposed universal service reforms on behalf of ATNI and its subsidiaries, Allied Wireless, Choice Communications, LLC, and Commnet Wireless, LLC (herein collectively referred to as the "ATNI companies").

Representatives for the ATNI companies indicated that universal service reforms should: be competitively and technologically neutral; include support for capital and operational exMarlene H. Dortch, Secretary September 14, 2011 Page 2

penses for existing and future operations; and, utilize forward-looking economic cost models to ensure the efficient provision of service to end-user customers.

Representatives for the ATNI companies stressed the importance of establishing new universal service funding mechanisms that are effective in making sufficient support available for the deployment and operation of mobile broadband infrastructure, including the maintenance of existing mobile network facilities, described the adverse effects that any reduction or elimination of support would have on operations, and also addressed the importance of sufficient universal service funding in the tribal and insular areas served by the ATNI companies.

Representatives for the ATNI companies distributed a document setting forth internal business information illustrating the adverse effects that the elimination of universal service support would have on the deployment and ongoing operation of various ATNI companies' cellular facility sites. Representatives for the ATNI companies relied upon the document in explaining that certain actions proposed by the Commission in the pending rulemaking proceeding could result in the decommissioning of existing sites operated by the ATNI companies as well as the reduction in future planned investment and expansion of the ATNI companies' infrastructure.

The document was appropriately identified as confidential, and ATNI is also submitting to the Commission, under separate cover, a copy of the document that will be marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION."

If you have any questions or require any additional information, please contact undersigned counsel directly.

Low B. Lite

Sincerely,

Todd B. Lantor

Attorney for Atlantic Tele-Network, Inc., Allied Wireless Communications Corporation, Choice Communications, LLC and Commnet Wireless, LLC

cc: Rick Kaplan
Zachary Katz
Angela Kronenberg
Carol Mattey
Margaret McCarthy
James Schlichting

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> Amy Bender Patrick Halley Margaret Wiener Douglas Minster Rohan Ranaraja